42 PALE 794 BOOK

- 5. If a partnership agreement existed between you and the Defendant, state the method in which profits and losses were to be allocated.
- Do you contend that no partnership relation ever existed between you and the Defendant?
- 7. If so, state the facts on which you base this contention.
- What was the nature of the business activity engaged in by you and the Defendant?
- Do you have custody and control of books of account reflecting the partnership's business transactions?
- 10. Do you have custody and control of books of account reflecting business transactions of the Defendant?
- || 11. Do you contend that Lot 18, Section 2 of Deer Springs Farms, a plat of which is recorded in Plat Book 7, folio 61, among the Plat Records of Frederick County, is owned by you and the Defendant for use in a partnership between you and the Defendant for the construction of residential dwellings and resale?
- 12. Do you contend that Lot 1, Section 2 of Deer Springs Farms, a plat of which is recorded in Plat Book 7, folio 61, among the Plat Records of Frederick County, and previously sold, was owned by you and the Defendant for use in a partnership between you and the Defendant for the construction of residential dwellings and resale?
- 113. Do you contend that Lot 3, Section 2 of Deer Springs Farms, a plat of ||which is recorded in Plat Book 7, folio 61, among the Plat Records of Frederick ||County, and previously sold, was owned by you and the Defendant for use in a ||partnership between you and the Defendant for the construction of residential ||dwellings and resale?
- Did you loan Charles Melvin Shoemaker any monies for the purchase of the ||real estate that is the subject of this action?
- 15. If so, state when and how much and the repayment terms.
- 16. Did you loan a partnership between you and the Defendant for the purpose |of construction of residential dwellings for resale any monies?
- 17. If so, state when and how much and the repayment terms.
- 18. Do you contend that you contributed new capital to either the Defendant or a partnership described heretofore subsequent to April 15, 1975?
- ||19. If so, state the amount contributed and the date of contribution.
- | 20. Do you have any written evidence showing that such contribution was made ||and, if so, attach a copy of such written evidence to your Answers to these Interrogatories?
- 21. Do you contend that the Defendant is indebted to you for any sums in con-||nection with the property that is the subject of your Bill for Partition and ||Sale of Real Estate and, if so, state the amount of the indebtedness?
- ||22. Did you and the Defendant have any disagreements in regard to the opera-||tion of the construction of residential dwellings for resale?
- ||23. Was there any agreement between you and the Defendant governing the dis-FREDERICK, MARYLAND 21701 || tribution of the properties or any monies in connection therewith that is the Usubject of the Bill for Partition and Sale of Real Estate?

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